

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

TIARA ENGLE and PORTNER)	CIVIL NO. 04-00256 SOM BMK
ORTHOPEDIC REHABILITATION,)	(Other Civil Action)
INCORPORATED,)	
)	DECLARATION OF KENNETH J.
Plaintiffs,)	MANSFIELD
)	
vs.)	
)	
LIBERTY MUTUAL FIRE)	
INSURANCE COMPANY; JOHN)	
DOES 1-10, JANE DOES 1-10; DOE)	
CORPORATIONS 1-10, DOE)	
PARTNERSHIPS 1-10, ROE "NON-)	
PROFIT" CORPORATIONS 1-10;)	
and ROE GOVERNMENTAL)	
ENTITIES 1-10,)	
)	
Defendants.)	
)	
_____)	

DECLARATION OF KENNETH J. MANSFIELD

KENNETH J. MANSFIELD declares and states the following:

1. I am an attorney with the law firm of McCorriston Miller Mukai MacKinnon LLP and counsel for Defendant Liberty Mutual Fire Insurance Company ("Defendant Liberty") in the above-referenced matter. I submit this declaration in support of Defendant Liberty's Memorandum in Opposition to Plaintiffs' First Motion to Compel Production of Documents, Filed on September

7, 2006. Unless otherwise indicated, all statements made herein are based on my personal knowledge.

2. Attached hereto as Exhibit "A" is a true and correct copy of Defendant Liberty Mutual Fire Insurance Company's Response to Plaintiffs' First Request for Production of Documents Dated November 18, 2004.

3. Attached hereto as Exhibit "B" is a true and correct copy of Defendant Liberty Mutual Fire Insurance Company's Response to Plaintiffs' Second Request for Production of Documents to Defendant Liberty Mutual Fire Insurance Company.

4. Attached hereto as Exhibit "C" is a true and correct copy of an April 13, 2006 letter from Kenneth J. Mansfield to Harvey M. Demetrakopoulos.

I, KENNETH J. MANSFIELD, do declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of September, 2006 at Honolulu, Hawaii.



KENNETH J. MANSFIELD